

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CITY OF NEWARK,

Plaintiff,

- against -

No. 2:25-cv-02225-JKS-LDW

GEO RE-ENTRY GROUP, LLC;
ABC CORPS. (A FICTIOUS
COMPANY) 1-100,

**SUPPLEMENTAL
RESPONSE TO COURT
ORDER (ECF NO. 24) AND
REQUEST FOR BRIEF
EXTENSION**

Defendants.

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Defendant The GEO Group, Inc., incorrectly sued as GEO Re-Entry Group, LLC (“GEO”), respectfully provides this supplemental response to the Court’s order docketed at ECF No. 24.

On April 21, 2025, GEO filed documents with the Court relating to the requested “issued permits or certificates relating to Delaney Hall since January 1, 2023.” *See* ECF No. 28. GEO further represented that it was currently in the process of coordinating with ICE to complete the necessary redactions to the contract in order to provide it to the Court. The ICE contract is approximately 2,300 pages in length. In light of the length and the sensitive and confidential material, as described in GEO’s previous filing, *see id.*, it typically takes several weeks to redact a document of this length. Under the contract terms, GEO needs ICE’s explicit approval before it can release any language from that contract.

GEO has been diligently working with ICE to prepare the contract for submission since first ordered by this Court on April 17, 2025. Unfortunately, that process is not yet completed.

Accordingly, GEO respectfully requests an additional brief extension to provide the Court with a copy of the ICE Contract, which GEO hopes to be able to provide no later than Thursday, April 24, 2025, in advance of the hearing currently scheduled for April 25, 2025. GEO can provide the Court with daily updates on the status, if so ordered.